

9002

McCABE, WEISBERG & CONWAY, P.C.

By: Alexandra T. Garcia, Esquire (Atty. I.D.# ATG4688)

216 Haddon Avenue, Suite 303

Westmont, NJ 08108

856-858-7080

Attorney for Movant: Wells Fargo Bank, N.A.

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Camden Vicinage

In re:

Patrick J. Monaghan  
Cathaline E. Monaghan

Debtor(s)

Case No.: 09-24618-GMB

Chapter: 13

Judge: Gloria M. Burns

CERTIFICATION IN SUPPORT OF  
MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY

I, Michael Kalbach, do hereby certify:

1. I am a Bankruptcy Specialist at Wells Fargo Bank, N.A. and I have complete knowledge of the amount due on the within obligation and mortgage and I am authorized to make this certification.

2. Wells Fargo Bank, N.A. is the holder of a mortgage on real property owned by the Debtors and located at 20 Duke Drive, Sicklerville, NJ 08081 ("Premises"), recorded in the Office of the Clerk of Gloucester County.

3. The mortgage executed by the Debtors grants the Movant a lien on the Premises.

4. The Debtors have defaulted upon the note and mortgage as to post-petition payments.

5. Movant has not received payments on the note and it lacks adequate protection of its interest for the months of May 22, 2011 through and including June 22, 2011.

6. Since June 5, 2009, Movant has incurred attorney's fees in connection with this

Motion.

7. The amount of the Debtors' monthly payment and the total post-petition arrears due and owing are provided on the attached Certification regarding the Post-Petition Payment History.

8. This certification is made in support of the Motion for Relief from the Automatic Stay so that Movant, Wells Fargo Bank, N.A., may exercise all its rights under the applicable non-bankruptcy law and to move to protect its rights under the mortgage contract.

9. I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

Date:

7-18-2011

  
Name:

Title: Bankruptcy Specialist

9002

**McCABE, WEISBERG & CONWAY, P.C.**

**By: Alexandra T. Garcia, Esquire (Atty. I.D.# ATG4688)**

**216 Haddon Avenue, Suite 303**

**Westmont, NJ 08108**

**856-858-7080**

**Attorney for Movant: Wells Fargo Bank, N.A.**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY  
Camden Vicinage**

In re:

Patrick J. Monaghan  
Cathaline E. Monaghan

Debtor(s)

Case No.: 09-24618

Chapter: 13

Judge: Gloria M. Burns

**CERTIFICATION REGARDING POST-PETITION PAYMENT HISTORY  
ON THE NOTE AND MORTGAGE DATED January 10, 2003**

Michael Kalbach of full age, employed as a Bankruptcy Specialist  
by Wells Fargo Bank, N.A., hereby certifies the following information:

**BACKGROUND INFORMATION**

Recorded on February 1, 2003, in Camden County, in Book 6249, at Page 434

Property Address: 20 Duke Drive, Sicklerville, NJ 08081

Mortgage Holder: Wells Fargo Bank, N.A. - Loan #7494

Mortgagor(s)/Debtor(s): Patrick J. Monaghan & Cathaline E. Monaghan

Date Debtor(s) petition was filed: June 5, 2009

Post-petition payment address: Wells Fargo Bank, N.A.  
Bankruptcy Department  
PO Box 31557 MAC B6955-01B  
Billings, MT 59107-1557

**AMOUNT OF POST-PETITION DEFAULT**

Amount of Debtor(s) monthly mortgage payment: \$ 940.35

Amount of Debtor(s) monthly late charge: N/A

Total monthly payment including late charge: \$ 940.35

Since the petition date, 25 payments should have been made to the mortgagee. Since the petition date only 23 payment(s) have been made, leaving 2 payment(s) in arrears through the payment due June 22, 2011. The total amount of post-petition payment default (monthly payment without late charge less funds in suspense) is \$1,833.70.

**POST-PETITION PAYMENTS RECEIVED** (Petition filed on June 5, 2009)

Amount Due	Date Payment Was Due	How Payment Applied (Mo./Yr.)	Amount Received	Date Payment Received	Suspense Balance
\$893.35	06/22/09	06/22/09	\$940.35	06/26/09	\$47.00
\$940.35	07/22/09	07/22/09	\$940.35	07/28/09	\$47.00
\$940.35	08/22/09	08/22/09	\$940.35	08/26/09	\$47.00
\$940.35	09/22/09	09/22/09	\$940.35	09/28/09	\$47.00
\$940.35	10/22/09	10/22/09	\$940.35	10/27/09	\$47.00
\$940.35	11/22/09	11/22/09	\$940.35	11/30/09	\$47.00
\$940.35	12/22/09	12/22/09	\$940.35	12/31/09	\$47.00
\$940.35	01/22/10	01/22/10	\$940.35	01/25/10	\$47.00
\$940.35	02/22/10	02/22/10	\$940.35	03/01/10	\$47.00
\$940.35	03/22/10	03/22/10	\$940.35	03/30/10	\$47.00
\$940.35	04/22/10	04/22/10	\$940.35	05/03/10	\$47.00
\$940.35	05/22/10	05/22/10	\$940.35	06/02/10	\$47.00
\$940.35	06/22/10	06/22/10	\$940.35	07/06/10	\$47.00
\$940.35	07/22/10	07/22/10	\$940.35	08/02/10	\$47.00
\$940.35	08/22/10	08/22/10	\$940.35	09/03/10	\$47.00
\$940.35	09/22/10	09/22/10	\$940.35	10/01/10	\$47.00
\$940.35	10/22/10	10/22/10	\$940.35	11/05/10	\$47.00
\$940.35	11/22/10	11/22/10	\$940.35	12/10/10	\$47.00
\$940.35	12/22/10	12/22/10	\$940.35	02/04/11	\$47.00
\$940.35	01/22/11	01/22/11	\$940.35	02/22/11	
\$940.35	02/22/11	02/22/11	\$941.00	04/08/11	\$47.00
\$940.35	03/22/11	03/22/11	\$940.35	05/02/11	\$47.00
\$940.35	04/22/11	04/22/11	\$940.35	07/11/11	\$47.00
\$940.35	05/22/11		\$0.00		\$47.00
\$940.35	06/22/11		\$0.00		\$47.00

If the monthly payment has changed during the pendency of the case, please explain:

AMOUNT HELD IN SUSPENSE (if any): \$47.00

**CURRENT MONTHLY PAYMENT**

Effective as of January 31, 2011, the current monthly payment is comprised of:

Principal/Interest... \$ 940.35  
R.E. Taxes/Insurance. \$ ----  
Late Charge..... \$-----  
Other..... \$----- (Specify: -----)  
TOTAL..... \$940.35

**ADDITIONAL CHARGES AND/OR ADVANCES MADE POST-PETITION**

Post-petition bankruptcy fees and costs for within motion: \$450.00/\$150.00  
Post-petition advances made for taxes: \$ -----  
Post-petition advances made for insurance: \$ -----  
Other fees: \$ -----  
(please specify):

PRE-PETITION ARREARS: to  
( mos. x = )

I certify under penalty of perjury that the foregoing is true and correct.

Date

7-18-2011

Name:

William Kallish